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7 *Specialty Insurance Corporation*

8 UNITED STATES DISTRICT COURT  
9 DISTRICT OF NEVADA

10 CAPITOL SPECIALTY INSURANCE  
11 CORPORATION, a Wisconsin corporation,  
12 as assignee of UNITED CONSTRUCTION  
COMPANY,

13 Plaintiff,

14 v.

15 STEADFAST INSURANCE COMPANY, a  
16 Delaware corporation; RHP MECHANICAL  
17 SYSTEMS, a Nevada corporation; and AXIS  
18 SURPLUS INSURANCE COMPANY, an  
Illinois corporation,

19 Defendants.  
20

Case No.: 2:20-cv-1382-JCM-VCF

**STIPULATION AND ~~[PROPOSED]~~  
ORDER TO CONTINUE 10/28/22  
HEARING ON STEADFAST  
INSURANCE COMPANY'S MOTION  
FOR PROTECTIVE ORDER (ECF No.  
109)**

21 PLAINTIFF Capitol Specialty Insurance Corporation ("CapSpecialty") and Defendant  
22 STEADFAST INSURANCE COMPANY ("Steadfast"), by and through their respective attorneys  
23 of record, hereby STIPULATE and agree, subject to this Court's approval, to continue the hearing  
24 regarding Steadfast Insurance Company's Motion for Protective Order (ECF No. 109), currently  
25 scheduled for October 28, 2022 at 10:00 a.m. before Judge Ferenbach (ECF No. 128), until after  
26 November 1, 2022. Good cause exists to continue the hearing on the Motion to a later date as a  
27 key deposition is scheduled for November 1, 2022. Based on the outcome of this deposition, the  
28

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parties may be able to reach an agreement on the Motion so as to obviate the need for a hearing. The parties further STIPULATE and agree that Ramie Morales' compliance with the subpoenas that are the subject of the Motion, if so ordered by the Court, may take place after the discovery cut-off date of November 4, 2022 (ECF No. 130). The parties further STIPULATE and agree that the depositions of Matt Ennis and Danielle Hill may be completed after the discovery cut-off date of November 4, 2022 (ECF No. 130).

IT IS SO STIPULATED.

Dated: October 24, 2022

Dated: October —, 2022

PAYNE & FEARS LLP

MORALES FIERRO & REEVES

By: /s/ Sarah J. Odia  
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Attorneys for Plaintiff CAPITOL SPECIALTY  
INSURANCE CORPORATION

Attorneys for Defendant STEADFAST  
INSURANCE COMPANY

**ORDER**

video conference  
IT IS SO ORDERED. The hearing on the Motion is continued to the following date and time: 1:00 PM, November 30, 2022

DATED: 10-26-2022

  
UNITED STATES MAGISTRATE JUDGE

4892-5241-2987.2